

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) Criminal No. 05-30017-MAP
)
)
 v.)
)
 CARLOS MARRERO,)
 Defendant.)

GOVERNMENT'S SECOND MOTION FOR ENTRY
OF AN ORDER OF EXCLUDABLE DELAY

Now comes the United States, by its undersigned attorneys,
and hereby moves that the Court enter an Order of Excludable
Delay from June 16, 2006 through November 8, 2006 pursuant to 18
U.S.C. §3161(h)(8)(A). The government relies on the following in
support thereof.

On April 19, 2006, Attorney Linda Thompson filed a Motion to
Withdraw as counsel for the defendant which was allowed by this
Court on April 28, 2006. Prior to Attorney Thompson's Motion to
Withdraw, beginning on March 4, 2006, the defendant and his
attorney were reviewing discovery and otherwise attempting to
determine whether the case was going to be a trial.

The Court appointed the Federal Defender's Office and the
defendant is now represented by Attorney Timothy Watkins.
Attorney Watkins is the fourth attorney to represent the
defendant in this case. Attorney Watkins requested time within
which to review discovery and determine whether the case will
require a trial. At the May 15, 2006, Status Conference the

Court set another Status Conference for June 16, 2006. The Status Conference was twice postponed at the defendant's request, first to July 25, 2006 then to September 8, 2006.

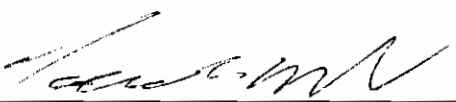
During the September 8, 2006, Status Conference the defendant requested another Status Conference in eight weeks for reasons set forth during a sealed hearing.

Therefore, the government moves that the Court exclude the time between June 16, 2006, and November 8, 2006 from the speedy trial time period pursuant to 18 U.S.C. §3161(h)(8)(A). The exclusion of this time from the Speedy Trial time period is in the interests of justice. The defendant assents to this motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

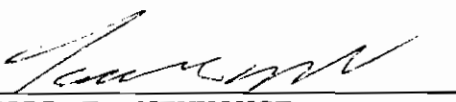

TODD E. NEWHOUSE
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
September 8, 2006

I, Todd E. Newhouse, Assistant U.S. Attorney, do hereby certify that I have served, by first class mail, a copy of the foregoing, to all counsel of record.


TODD E. NEWHOUSE
Assistant U.S. Attorney